

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

CERTIFICATE OF NO RESPONSE

On October 4, 2013 and October 16, 2013, all parties in interest were served with copies of the Motion of The Detroit Public Safety Unions, Pursuant to Section 105(a) of the Bankruptcy Code, for Entry of an Order Extending the Chapter 9 Stay to Any Action or Claim for Damages Brought Against Any Former Detroit Public Safety Union Member, Including Any Retiree, Which Arises Out of His or Her City Employment and Certificate of Service; Ex Parte Order Granting Motion to Expedite; Declaration of Edward V. Keelean regarding Plaintiff Contact Information and Mailing Matrix (See Docket Nos. 1081 and 1202). No objections were received by the Court or counsel for the Debtor within the time requirements set forth by Judge Rhodes in the Ex Parte Order Granting Motion to Expedite entered October 9, 2013.

WHEREFORE, Movant prays that this Honorable Court enter the Order Pursuant to Section 105(a) of the Bankruptcy Code Extending the Chapter 9 Stay to Any Action or Claim for Damages Brought Against Any Former Detroit Public Safety Union Member, Including Any Retiree, Which Arises Out of the Good

Faith Performance of His or Her Duties While Employed by the City filed concurrently with this Certificate.

ERMAN, TEICHER, MILLER,
ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek
Earle I. Erman (P24296)
Craig E. Zucker (P39907)
Barbara A. Patek (P34666)
Counsel for the Detroit Public Safety
Unions
400 Galleria Officentre, Suite 444
Southfield, MI 48034
Telephone: (248) 827-4100
Facsimile: (248) 827-4106
E-mail: bpatek@ermanteicher.com

Dated: November 14, 2013